

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
New Part 4 of the Commission's Rules)	
Concerning Disruptions of Communications)	ET Docket No. 04-35
)	

REPLY COMMENTS OF VERISIGN, INC.

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INTRODUCTION

For more than a decade, VeriSign has provided an array of large-scale, ultra-high availability, trusted infrastructures that enable signalling, security, identity management, directory, financial transaction, and fraud management capabilities for just about any kind of network based business and consumer services – whether it be Internet, Web, Internet access, traditional voice telephony, VoIP, multimedia, next generation, or sales. VeriSign operates through multiple divisions that have offices and staff in the United States and worldwide.

As part of these commercial infrastructure support services, VeriSign operates the largest independent SS7 Intelligent Network based infrastructure in the U.S. for a large number of wireline, wireless, cable, and VoIP providers. VeriSign also participates in or leads many of the related technology, industry, and standards activities.

As a result, VeriSign is a significant interested party in the subject Notice of Proposed Rulemaking.

I

THIRD PARTY SS7 PROVIDERS SHOULD NOT BE SUBJECT TO REPORTING REQUIREMENTS INDEPENDENT FROM THEIR CARRIER CUSTOMERS

Third party providers of SS7 services should be excluded from outage reporting requirements. A third party vendor does not have visibility to the impact of events on end users, and it is this end user impact that is the impetus for their reporting criteria.

Third party vendors do and should support their carrier customers' reporting requirements, and may be held accountable through commercial agreements with their carrier customers. However, they should not be required to report directly since they do not provide services directly to end users and because such a mandate would cause duplication of efforts and possibly conflicting information.

II

THRESHOLD CRITERIA FOR TRIGGERING REPORTING SHOULD REFLECT INDUSTRY MONITORING PRACTICES

The end user criteria proposed by the FCC is not relevant to third party SS7 networks. Neither loss or blocking of at least 90,000 ISDN User Part (ISUP) messages (actual), nor loss or blocking of at least 90,000 ISDN User Part (ISUP) messages (historical) reflect that current monitoring of service provider SS7 networks and such data would be difficult to capture in real time. Moreover, compliance with an obligation to acquire such information would impose a significant amount of development and expense.

In addition, double reporting could occur since SS7 disruptions cause blocked calls in a service provider network (ISUP measurement unnecessary for SS7 serving some provider's network). Double reporting could also occur since both the wholesale provider and service provider could report the information. Problems can occur in the wireline, wireless, hub provider or end user's networks. The wireline or wireless carriers must first determine that there was a reportable event and then each network must work cooperatively to determine the relevant incident data. Mandating multiple versions of the same event will not aid in the discovery process.

Historical counts would severely overestimate customer impact due to the number ISUP messages associated with a single call. These metrics, which are the same ones used for LEC and IXC outages, essentially don't apply to the SS7 Network. An SS7 hub network operator really has no way of calculating all of the metrics.

III.

CONCLUSION

The Commission should not extend outage reporting requirements for the reasons stated above. Moreover, VeriSign maintains that the data-driven, self-improvement model developed through the Network Reliability Council (NRC) Best Practices process has produced, (and will continue to produce) a productive public-private partnership that

can satisfy the Commission's needs for accurate and timely outage data in the absence of extended reporting mandates.